

1 David S. Kahn  
2 Nevada Bar No. 007038  
3 J. Scott Burris  
4 Nevada Bar No. 010529  
5 WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP  
6 300 South Fourth Street, 11th Floor  
7 Las Vegas, NV 89101  
8 (702) 727-1400; FAX (702) 727-1401  
9 E-mail:[David.Kahn@wilsonelser.com](mailto:David.Kahn@wilsonelser.com)  
10 [J.Scott.Burris@wilsonelser.com](mailto:J.Scott.Burris@wilsonelser.com)  
11 [Juan.Rodriguez@wilsonelser.com](mailto:Juan.Rodriguez@wilsonelser.com)

12 Stephen M. Gaffigan (*Pro Hac Vice*)  
13 STEPHEN M. GAFFIGAN, P.A.  
14 401 East Las Olas Blvd., Suite 130-453  
15 Ft. Lauderdale, Florida 33301  
16 Telephone: (954) 767-4819  
17 Facsimile: (954) 767-4821  
18 E-mail:[stephen@smgpa.net](mailto:stephen@smgpa.net)

19 *Attorneys for Plaintiff, CHANEL, INC.*

20 THE UNITED STATES DISTRICT COURT  
21 FOR THE DISTRICT OF NEVADA

22 CHANNEL, INC., ) Case No. 2:11-cv-01508-KJD-PAL  
23 Plaintiff, )  
24 v. )  
25 THE PARTNERSHIPS and )  
26 UNINCORPORATED ASSOCIATIONS )  
27 IDENTIFIED ON SCHEDULE "A" and )  
28 DOES 1-1000, )  
Defendants. )

ORDER GRANTING  
PLAINTIFF'S THIRD *EX PARTE*  
APPLICATION FOR ENTRY OF  
TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION

29 THIS CAUSE is before the Court on Plaintiff's Third *Ex Parte* Application For Entry of a  
30 Temporary Restraining Order and Preliminary Injunction (the "Third Application for TRO").  
31 Plaintiff, Chanel, Inc. ("Plaintiff" or "Chanel"), moves, on an *ex parte* basis, for entry of a temporary  
32 restraining order, and, upon expiration of the temporary restraining order, a preliminary injunction  
33 against Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440,  
441

1 451, 529, 655, 690<sup>1</sup>, and 708-773, the Partnerships and Unincorporated Associations identified on  
 2 Schedule "A" attached hereto ("Defendants 708-773"), pursuant to 15 U.S.C. § 1116 and Fed. R.  
 3 Civ. P. 65 for alleged violations of the Lanham Act, 15 U.S.C. §§ 1114, and 1125(a) and (d).

4 For reasons set forth herein, Plaintiff's Third Application for TRO is GRANTED.

5 **I. Factual Background**

6 The Court bases this Third Temporary Restraining Order on the following facts from  
 7 Plaintiff's First Amended Complaint, Application for TRO, Third Application for TRO and  
 8 supporting evidentiary submissions on file in this action.

9 Chanel is a corporation duly organized under the laws of the State of New York with its  
 10 principal place of business in the United States located at Nine West 57th Street, New York, New  
 11 York 10019. (First Amended Compl. ¶ 3.) Chanel operates boutiques throughout the world,  
 12 including within this Judicial District. See id. Chanel is, in part, engaged in the business of  
 13 manufacturing and distributing throughout the world, including within this Judicial District, a variety  
 14 of high quality luxury goods. (Declaration of Adrienne Hahn Sisbarro in Support of Plaintiff's Third  
 15 *Ex Parte* Application for TRO ["Hahn Third Decl."] ¶ 5.)

16 Chanel is, and at all times relevant hereto has been, the owner of all rights in and to the  
 17 following trademarks:

Trademark	Registration Number	Registration Date	Class(es)/Goods
CHANEL	0,612,169	September 13, 1955	IC 014 - Necklaces

25 <sup>1</sup> Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529,  
 26 655, and 690, are already subject to Preliminary Injunctions entered in this matter (e-docket Nos. 22  
 27 and 55). However, they have recently begun operating websites promoting and selling goods  
 bearing counterfeits of the Chanel Marks under the new domain names identified according to their  
 Defendant number on Schedule "A" hereto.

1	CHANEL	0,626,035	May 1, 1956	IC 018 – Women's Handbags
2	CHANEL	0,902,190	November 10, 1970	IC 014 - Bracelets, Pins, and Earrings
3	CHANEL	0,906,262	January 19, 1971	IC 025 - Coats, Suits, Blouses, and Scarves
4	CHANEL	0,915,139	June 15, 1971	IC 025 - Women's Shoes
5	CHANEL	0,955,074	March 13, 1973	IC 014 – Watches
6	©	1,241,264	June 7, 1983	IC 025 - Suits, Jackets, Skirts, Dresses, Pants, Blouses, Tunics, Sweaters, Cardigans, Tee-Shirts, Coats, Raincoats, Scarves, Shoes and Boots
7	CHANEL	1,241,265	June 7, 1983	IC 025 - Suits, Jackets, Skirts, Dresses, Pants, Blouses, Tunics, Sweaters, Cardigans, Coats, Raincoats, Scarves, Shoes and Boots
8	©	1,271,876	March 27, 1984	IC 025 - Clothing-Namely, Coats, Dresses, Blouses, Raincoats, Suits, Skirts, Cardigans, Sweaters, Pants, Jackets, Blazers, and Shoes
9	©	1,314,511	January 15, 1985	IC 018 - Leather Goods-Namely, Handbags
10	CHANEL ®	1,329,750	April 9, 1985	IC 025 - Blouses, Skirts, Sweaters, Cardigans, Dresses
11	CHANEL	1,347,677	July 9, 1985	IC 018 - Leather Goods-namely, Handbags
12	©	1,501,898	August 30, 1988	IC 006 - Keychains

			IC 014 - Costume Jewelry IC 016 - Gift Wrapping Paper IC 025 - Blouses, Shoes, Belts, Scarves, Jackets, Men's Ties IC 026 – Brooches and Buttons for Clothing
7	CHANEL	1,510,757	November 1, 1988
8		1,654,252	August 20, 1991
9	CHANEL	1,733,051	November 17, 1992
10			IC 018 - Leather Goods; namely, Handbags, Wallets, Travel Bags, Luggage, Business and Credit Card Cases, Change Purses, Tote Bags, Cosmetic Bags Sold Empty, and Garment Bags for Travel
11		1,734,822	November 24, 1992
12	J12	2,559,772	April 9, 2002
13		3,025,934	December 13, 2005
14			IC 014 - Timepieces; namely, Watches, and Parts Thereof
15		3,025,934	December 13, 2005
16			IC 018 – Handbags
17		3,025,936	December 13, 2005
18			IC 009 - Mobile Phone Straps, Eyeglass Frames, Sunglasses
19			IC 025 - Gloves, Swimwear
20			IC 026 - Hair Accessories Namely Barrettes And Pony-Tail Holders
21			
22			
23			
24			
25			
26			
27			
28			

1 CHANEL	3,133,139	August 22, 2006	IC 014 - Jewelry And Watches
-------------	-----------	--------------------	------------------------------

3 (the “Chanel Marks”) which are registered on the Principal Register of the United States Patent and  
 4 Trademark Office and are used in connection with the manufacture and distribution of high quality  
 5 goods in the categories identified above. (Declaration of Adrienne Hahn Sisbarro in Support of  
 6 Plaintiff’s *Ex Parte* Application for TRO (DE 7-14) [“Hahn Decl.”]; see also United States  
 7 Trademark Registrations of the Chanel Marks at issue [“Chanel Trademark Registrations”] attached  
 8 as Exhibit A to the Hahn Decl. (DE 7-15)).

9 Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440,  
 10 451, 529, 655, 690, and 708-773, via the domain names identified on Schedule “A” hereto (the  
 11 “Group IV Subject Domain Names”), have advertised, promoted, offered for sale, and/or sold, at  
 12 least, handbags, wallets, shoes, boots, sunglasses, tee shirts, watches, and costume jewelry, including  
 13 necklaces, bracelets, earrings, brooches, and rings bearing what Plaintiff has determined to be  
 14 counterfeits, infringements, reproductions, and/or colorable imitations of the Chanel Marks.  
 15 Although each of the Defendants may not copy and infringe each Chanel Mark for each category of  
 16 goods protected, Chanel has submitted sufficient evidence showing each Defendant has infringed, at  
 17 least, one or more of the Chanel Marks. (Hahn Third Decl. ¶¶ 11-15; Declaration of Malerie Maggio  
 18 in Support of Plaintiff’s Third *Ex Parte* Application for Entry of Temporary Restraining Order and  
 19 Preliminary Injunction [“Maggio Decl.”] ¶ 4.) Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248,  
 20 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and 708-773 are not now, nor have they ever  
 21 been, authorized or licensed to use, reproduce, or make counterfeits, infringements, reproductions,  
 22 and/or colorable imitations of the Chanel Marks. (Hahn Third Decl. ¶ 9.)

23 Plaintiff’s counsel retained Malerie Maggio (“Maggio”) of Investigative Consultants, a  
 24 licensed private investigative firm, to investigate suspected sales of counterfeit Chanel branded  
 25 products by Defendants 708-773. (Hahn Third Decl. ¶ 10; Maggio Decl. ¶ 3.) On December 9, 2011,  
 26 Maggio accessed the Internet websites operating under the three of the domain names at issue in this  
 27 action, bagsaleoutlet.com, ebagsale.net, jewelrysale2.org, placed orders for the purchase of various

1 Chanel branded products, including a handbag, a wallet and a necklace and requested each product  
 2 purchased be shipped to her address in Las Vegas, Nevada. (Maggio Decl. ¶ 4 and Composite  
 3 Exhibit A attached thereto.) Maggio's purchases<sup>2</sup> were processed entirely online, which included  
 4 providing shipping and billing information, payment, and confirmation of her orders. (Maggio Decl.  
 5 ¶ 4 and Composite Exhibit A attached thereto.)

6 Thereafter, a representative of Chanel, Adrienne Hahn Sisbarro, reviewed and visually  
 7 inspected the web page listings, including images, for each of the Chanel branded goods purchased  
 8 by Maggio and determined the items were non-genuine Chanel products. (Hahn Third Decl. ¶¶ 11-  
 9 12, 15.) Additionally, Hahn reviewed and visually inspected the items bearing the Chanel Marks  
 10 offered for sale via the Internet websites operating under the partnership and/or unincorporated  
 11 association names identified on Schedule "A" hereto, the Group IV Subject Domain Names, and  
 12 determined the products were non-genuine Chanel products. (Hahn Third Decl. ¶¶ 13-15 and  
 13 Composite Exhibits A and B attached thereto.)

## 14 II. Conclusions of Law

15 The declarations Plaintiff submitted in support of its Third Application for TRO support the  
 16 following conclusions of law:

17 A. Plaintiff has a very strong probability of proving at trial that consumers are likely to  
 18 be confused by the Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434,  
 19 436, 440, 451, 529, 655, 690, and 708-773's advertisement, promotion, sale, offer for sale, and/or  
 20 distribution of handbags, wallets, shoes, boots, sunglasses, tee shirts, watches, and costume jewelry,  
 21 including necklaces, bracelets, earrings, brooches, and rings bearing counterfeits, infringements,  
 22 reproductions, and/or colorable imitations of the Chanel Marks, and that the products Defendants 37,  
 23 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and  
 24 708-773 are selling and promoting are copies of Plaintiff's products that bear marks which are

26 \_\_\_\_\_  
 27 <sup>2</sup> Investigator Maggio's purchase via ebagsale.net remained pending at the time Chanel filed its  
 Application as she is awaiting payment instructions from the Defendant operating the associated  
 website. (Maggio Decl. ¶ 4.)

1 substantially indistinguishable from and/or colorful imitations of the Chanel Marks on handbags,  
 2 wallets, shoes, boots, sunglasses, tee shirts, watches, and costume jewelry, including necklaces,  
 3 bracelets, earrings, brooches, and rings.

4       B. Because of the infringement of the Chanel Marks, Plaintiff is likely to suffer  
 5 immediate and irreparable injury if a temporary restraining order is not granted. It clearly appears  
 6 from the following specific facts, as set forth in Plaintiff's First Amended Complaint, Plaintiff's  
 7 Third Application for TRO, and accompanying declarations on file, that immediate and irreparable  
 8 loss, damage, and injury will result to Plaintiff and to consumers before Defendants 37, 64, 101, 111,  
 9 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and 708-773 can be  
 10 heard in opposition unless Plaintiff's request for *ex parte* relief is granted:

11           1. Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433,  
 12 434, 436, 440, 451, 529, 655, 690, and 708-773 own or control Internet business operations which  
 13 advertise, promote, offer for sale, and sell, at least, handbags, wallets, shoes, boots, sunglasses, tee  
 14 shirts, watches, and costume jewelry, including necklaces, bracelets, earrings, brooches, and rings  
 15 bearing counterfeit and infringing trademarks in violation of Plaintiff's rights;

16           2. There is good cause to believe that more counterfeit and infringing handbags,  
 17 wallets, shoes, boots, sunglasses, tee shirts, watches, and costume jewelry, including necklaces,  
 18 bracelets, earrings, brooches, and rings bearing Plaintiff's trademarks will appear in the marketplace;  
 19 that consumers may be misled, confused, and disappointed by the quality of these products; and that  
 20 Plaintiff may suffer loss of sales for its genuine products;

21           3. There is good cause to believe that if Plaintiff proceeds with normal advance  
 22 notice to Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440,  
 23 451, 529, 655, 690, and 708-773 on this Third Application for TRO, Defendants 37, 64, 101, 111,  
 24 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and 708-773 can  
 25 easily and quickly transfer the registrations for many of the Group IV Subject Domain Names, or  
 26 modify registration data and content, change hosts, and redirect traffic to other websites, thereby  
 27 thwarting Plaintiff's ability to obtain meaningful relief;

4. The balance of potential harm to Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and 708-773 in restraining their trade in counterfeit and infringing branded goods if a temporary restraining order is issued is far outweighed by the potential harm to Plaintiff, its reputation and goodwill as a manufacturer of high quality handbags, wallets, shoes, boots, sunglasses, tee shirts, watches, and costume jewelry, including necklaces, bracelets, earrings, brooches, and rings if such relief is not issued; and

5. The public interest favors issuance of a temporary restraining order in order to protect Plaintiff's trademark interests and to protect the public from being defrauded by the palming off of counterfeit goods as genuine goods of the Plaintiff.

Upon review of Plaintiff's First Amended Complaint, Third Application for TRO, and supporting evidentiary submissions, it is hereby

ORDERED that Plaintiff's Third Application for TRO is GRANTED, according to the terms set forth below:

## **THIRD TEMPORARY RESTRAINING ORDER**

(1) Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and 708-773, their officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and 708-773 having notice of this Third Temporary Restraining Order are hereby temporarily restrained:

(a) From manufacturing, importing, advertising, promoting, offering to sell, selling, distributing, or transferring any products bearing the Chanel Marks, or any confusingly similar trademarks, other than those actually manufactured or distributed by Plaintiff; and

(b) From secreting, concealing, destroying, selling off, transferring, or otherwise disposing of: (i) any products, not manufactured or distributed by Plaintiff, bearing the Chanel Marks, or any confusingly similar trademarks; or (ii) any evidence relating to the manufacture, importation, sale, offer for sale,

1 distribution, or transfer of any products bearing the Chanel Marks, or any  
 2 confusingly similar trademarks.

3 (2) Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436,  
 4 440, 451, 529, 655, 690, and 708-773, their officers, directors, employees, agents, subsidiaries,  
 5 distributors, and all persons in active concert or participation with Defendants 37, 64, 101, 111, 133,  
 6 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and 708-773 having  
 7 notice of this Third Temporary Restraining Order shall immediately discontinue the use of the  
 8 Chanel Marks or any confusingly similar trademarks, on or in connection with all Internet websites  
 9 owned and operated, or controlled by them including the Internet websites operating under the  
 10 Group IV Subject Domain Names;

11 (3) Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436,  
 12 440, 451, 529, 655, 690, and 708-773, their officers, directors, employees, agents, subsidiaries,  
 13 distributors, and all persons in active concert or participation with Defendants 37, 64, 101, 111, 133,  
 14 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and 708-773 having  
 15 notice of this Third Temporary Restraining Order shall immediately discontinue the use of the  
 16 Chanel Marks, or any confusingly similar trademarks within domain name extensions, metatags or  
 17 other markers within website source code, from use on any webpage (including as the title of any  
 18 web page), any advertising links to other websites, from search engines' databases or cache memory,  
 19 and any other form of use of such terms which is visible to a computer user or serves to direct  
 20 computer searches to websites registered by, owned, or operated by Defendants 37, 64, 101, 111,  
 21 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and 708-773,  
 22 including the Internet websites operating under the Group IV Subject Domain Names;

23 (4) Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436,  
 24 440, 451, 529, 655, 690, and 708-773 shall not transfer ownership of the Group IV Subject Domain  
 25 Names during the pendency of this Action, or until further Order of the Court;

1                         (5)     The domain name Registrars for the Group IV Subject Domain Names are directed to  
 2 transfer to Plaintiff's counsel, for deposit with this Court, domain name certificates for the Group IV  
 3 Subject Domain Names;

4                         (6)     Upon entry of this Order, Plaintiff shall provide a copy of the Order by email to the  
 5 registrar of record for each of the Group IV Subject Domain Names, so that the registrar of record of  
 6 each of the Group IV Subject Domain Names may, in turn, notify each registrant of the Order and  
 7 provide notice of the locking of the domain name to the registrant of record. After providing such  
 8 notice to the registrars so the domain names may be locked, Plaintiff shall also provide notice and a  
 9 copy of this Order to the registrant of each Group IV Subject Domain Name via email to the email  
 10 address provided as part of the domain registration data for each of the Group IV Subject Domain  
 11 Names identified in the Third Application for TRO. If an email address was not provided as part of  
 12 the domain registration data for a Group IV Subject Domain Name, Plaintiff shall provide notice and  
 13 a copy of this Order to the operators of the Internet websites via an email address and/or online  
 14 submission forms provided on the Internet websites operating under such Group IV Subject Domain  
 15 Names. After forty-eight (48) hours have elapsed after the emailing of this Order to the registrars of  
 16 record and the registrants, Plaintiff shall provide a copy of this Order to the registries for the Group  
 17 IV Subject Domain Names for the purposes described in Paragraph 7 *infra*.

18                         (7)     The top-level domain (TLD) Registries for the Group IV Subject Domain Names,  
 19 within ten (10) business days of receipt of this Third Temporary Restraining Order shall change the  
 20 registrar of record for the Group IV Subject Domain Names, excepting any such domain names  
 21 which such Registries have been notified in writing by the Plaintiff have been or will be dismissed  
 22 from this action, to the United States based Registrar, GoDaddy.com, Inc. As a matter of law, this  
 23 Third Temporary restraining Order shall no longer apply to any Defendant or associated domain  
 24 name dismissed from this action. Upon the change of the registrar of record for the Group IV Subject  
 25 Domain Names to GoDaddy.com, Inc., GoDaddy.com, Inc. will maintain access to the Group IV  
 26 Subject Domain Names in trust for the Court during the pendency of this action. Additionally,  
 27 GoDaddy.com, Inc. shall immediately update the Domain Name System ("DNS") data it maintains

for the Group IV Subject Domain Names, which link the domain names to the IP addresses where their associated websites are hosted, to NS1.MEDIATEMPLE.NET and NS2.MEDIATEMPLE.NET, which will cause the domain names to resolve to the website where a copy of the Complaint, Summons, First Amended Complaint, First, Second and Third Temporary Restraining Orders, and all other documents on file in this action are displayed. Alternatively, GoDaddy.com, Inc. may institute a domain name forwarding which will automatically redirect any visitor to the Group IV Subject Domain Names to the following Uniform Resource Locator (“URL”) <http://servingnotice.com/sdv/index.html> whereon copies of the Complaint, Summons, First Amended Complaint, First, Second and Third Temporary Restraining Orders, and all other documents on file in this action are displayed. After GoDaddy.com, Inc. has effected this change the Group IV Subject Domain Names shall be placed on Lock status, preventing the modification or deletion of the domains by the registrar or the Defendants;

(8) Plaintiff may enter the Group IV Subject Domain Names into Google’s Webmaster Tools and cancel any redirection of the domains that have been entered there by Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and 708-773 which redirect traffic to the counterfeit operations to a new domain name and thereby evade the provisions of this Third Temporary Restraining Order;

(9) Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and 708-773 shall preserve copies of all their computer files relating to the use of any of the Group IV Subject Domain Names and shall take all steps necessary to retrieve computer files relating to the use of the Group IV Subject Domain Names and that may have been deleted before the entry of this Third Temporary Restraining Order;

(10) This Third Temporary Restraining Order shall remain in effect until the date for the hearing on the Third Motion for Preliminary Injunction set forth below, or until such further dates as set by the Court or stipulated to by the parties;

(11) This Third Temporary Restraining Order shall apply to the Group IV Subject Domain Names and any other domain names properly brought to the Court’s attention and verified by sworn

1 affidavit which verifies such new domain names are being used by Defendants 37, 64, 101, 111, 133,  
 2 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and 708-773 for the  
 3 purpose of counterfeiting the Chanel Marks at issue in this action and/or unfairly competing with  
 4 Chanel in connection with search engine results pages;

5 **BOND TO BE MAINTAINED**

6 (12) Pursuant to 15 U.S.C. § 1116(d)(5)(D), Plaintiff shall maintain its previously posted  
 7 bond in the amount of Twenty Thousand Dollars and Zero Cents (\$20,000.00), as payment of  
 8 damages to which Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434,  
 9 436, 440, 451, 529, 655, 690, and 708-773 may be entitled for a wrongful injunction or restraint.

10 **THIRD PRELIMINARY INJUNCTION**

11 (13) A hearing is set before this Court in the United States Courthouse located 333 S. Las  
 12 Vegas Blvd, Las Vegas, Nevada 89101, Courtroom 6D, on December 28, 2011,           , at  
 13 9 am, or at such other time that this Court deems appropriate, on Plaintiff's Third Motion for a  
 14 Preliminary Injunction restraining Defendants 708-773, their officers, directors, employees, agents,  
 15 subsidiaries, distributors, and all persons in active concert or participation with Defendants 708-773  
 16 from engaging in the activities that are subject of the above Third Temporary Restraining Order;

17 (14) Plaintiff shall serve copies of the First Amended Complaint, Third Application for  
 18 TRO and this Third Temporary Restraining Order and all other pleadings and documents on file in  
 19 this action on Defendants 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436,  
 20 440, 451, 529, 655, 690, and 708-773 by email as described above and by posting copies of the  
 21 Third Application for TRO and this Third Temporary Restraining Order on the website located at  
 22 <http://servingnotice.com/sdv/index.html> within forty-eight (48) hours of control of the Group IV  
 23 Subject Domain Names being changed to the Court via the GoDaddy.com, Inc. holding account, and  
 24 such notice so given shall be deemed good and sufficient service thereof. Plaintiff shall continue to  
 25 provide notice of these proceedings and copies of the documents on file in this matter to Defendants  
 26 37, 64, 101, 111, 133, 139, 149, 162, 248, 278, 348, 352, 433, 434, 436, 440, 451, 529, 655, 690, and  
 27 708-773 by regularly updating the website located at <http://servingnotice.com/sdv/index.html> or by

1 other means reasonably calculated to give notice which is permitted by the Court. Any response or  
2 opposition to Plaintiff's third Motion for Preliminary Injunction must be filed and served on  
3 Plaintiff's counsel prior to the hearing set for December 28, 2011, and filed with the Court, along  
4 with Proof of Service, on December 21, 2011. Plaintiff shall file any Reply Memorandum  
5 on or before December 27, 2011. The above dates may be revised upon stipulation by all  
6 parties and approval of this Court. Defendants 708-773 are hereby on notice that failure to appear at  
7 the hearing may result in the imposition of a preliminary injunction against them pursuant to 15  
8 U.S.C. § 1116(d) and Fed. R. Civ. P. 65.

9  
10 IT IS SO ORDERED.  
11 DATED: 12/14/11



12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
Kent J. Dawson  
United States District Judge

1 SCHEDULE A  
2  
3**DEFENDANTS BY GROUP IV SUBJECT DOMAIN NAMES AND DEFENDANT NUMBER**

4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	
DOMAIN NAME																									
chanelhandbags4u.com																									
rcheb.net																									
chanel-gucci.com																									
btobuy.net																									
designerbagsonlineshop.com																									
buychanelshop.com																									
replicas-sunglasses.com																									
sacschanelpascher.com																									
sacschanelpaschers.com																									
chanelhandbagsforsale.net																									
chanelborseprezzi.org																									
sacchannel-pascher.org																									
sacpascherchanel.org																									
sacpascherchanel.com																									
chanelborse-prezzi.com																									
xabags.com																									
ladybagsonsale.com																									
shoesbar.net																									
sungbags.com																									
fashionchanelhdbags.com																									
chanelbagsforsale2.com																									
cocochanelhandbagsh.net																									
cheapchanelbags.net																									
chaneloutletofficial.com																									
bow-sunglasses.com																									
chaneljewerys.net																									
chanelbags-2011.com																									
4ureplicahandbags.com																									
replica911.com																									
eta911.com																									
allpurse.com																									
angvall4rep.com																									
bagsaleoutlet.com																									
bagssonline.com																									
bagsvenus.com																									
beautifuljeansdiscountstore.com																									
beautifuljeansstoreoriginal.com																									
beautifuloriginaljeansstore.com																									
bestdiscountsportshoes.com																									

	bestjeansshop.com	720
1	boutiquesky.com	721
2	buychanelj12.com	722
3	chaloutlets.com	723
4	chanelbags7v.net	724
5	chanelbagsofficial.com	725
6	chanelclassicbags.com	726
7	chanelforsaleonline.com	727
8	chanelhandbagseu.com	728
9	chanelhandbagsforsale.us	729
10	chanelhandbagsoutlet.us	730
11	chanel-handbagss.com	731
12	chanelmallsale.com	732
13	chaneloutlet255.com	733
14	chaneloutlet6v.net	734
15	chaneloutletmallstore.com	735
16	charmhandbags.com	736
17	cheapbagsyard.com	737
18	cheapchanelbagsoutlet.org	738
19	cheapchanelhandbagss.com	739
20	cheapdesignerhandbag4u.com	740
21	cheapfrenchbags.com	741
22	chohun.com	742
23	chonsh.net	743
24	cnwholesaledesignerhandbags.com	744
25	coco-avant.com	745
26	cocobagshop.com	746
27	chanelbagsofficial.net	747
28	discountchanelhandbags.info	748
	ebagsale.net	749
	ebibiz.com	750
	enalias.net	751
	handbagsagency.com	752
	ifashion-handbag.com	753
	jeansshopdiscount.com	754
	jewelrysale2.org	755
	justhandbagshop.com	756
	justlovewatch.com	757
	louisvuittonoutletlondon.com	758
	lv-chanel-store.info	759
	mypurseshandbag.com	760
	newbags2u.net	761
	newchanelbags.org	762
	newfstalk.com	763
	newnikeshoponline.com	764
	niccshoes.com	765

1	replicachanelbagonline.com	766
2	sunglassesonlinesale.info	767
3	taschezeit.com	768
4	thetotebag4u.com	769
5	totebagshop.net	770
6	elegantchanel.info	771
7	ukreplicahandbags.co.uk	772
8	chanel-outlets.us	773

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28